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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
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BOSTON, MASSACHUSETTS 02114-2023

July 31, 2006

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James Colter, P.E.
Remedial Project Manager (Code OPNEEV)
Facilities Engineering Command, Mid-Atlantic
Naval Facilities Engineering Command
9742 Maryland Avenue
Norfolk, VA 23511-3095

Re: Draft Final Work Plan for the Remedial Investigation at Site 08 – NUSC Disposal Area

Dear Mr. Colter:

EPA reviewed the *Work Plan For Remedial Investigation, Site 08 – NUSC Disposal Area* for Naval Station Newport dated June 2006 in light of its technical adequacy, consistency, adherence to guidance, and responses to EPA's February 27, 2006 comments. Detailed comments are provided in Attachment A.

The work plan should include a proposed schedule based on an assumed work plan approval date. This schedule should identify activities required at an appropriate time (presumed to be the spring) to assess the existence of the overburden aquifer during high groundwater conditions. It is critical that this work be done in the appropriate season irrespective of when the rest of the remedial investigation work is completed.

I look forward to working with you and the Rhode Island Department of Environmental Management toward the cleanup of the NUSC Disposal Area. Please do not hesitate to contact me at (617) 918-1385 should you have any questions.

Sincerely,

Kymberlee Keckler, Remedial Project Manager
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RIDEM, Providence, RI
Cornelia Mueller, NETC, Newport, RI
Bart Hoskins, USEPA, Boston, MA
Chau Vu, USEPA, Boston, MA

Jennifer Stump, Gannet Fleming, Harrisburg, PA
Ken Finkelstein, NOAA, Boston, MA
Steven Parker, Tetra Tech-NUS, Wilmington, MA

ATTACHMENT A

Page	Comment
p. 3-1, §3.2	Please add a bullet for soil sampling (Section 3.2.1.5)
p. 3-8, §3.2.1.5	Please indicate in the second paragraph that soil samples will be collected from ground surface soil at 0-1 foot and from subsurface soil 1 foot below ground surface at 2-foot intervals, up to 10 foot deep. Although this sampling approach is later described in the document, this paragraph does not provide a clear definition of soil sample depths.
§3.2.2	Please explain why 10 of the 30 surface water and sediment samples will be analyzed for toxicity testing and a full suite of chemical analysis and the rest of the samples will be analyzed for lead only. All 30 samples should be sampled for all chemicals. Please explain whether the 0-6 inch sediment samples previously taken will be included in the database for use in the risk assessment along with the 0-4 inch samples to be collected. Please note that for human health risk evaluation purposes, EPA prefers surficial sediment only and considers 0-1 foot depth as surficial. All samples up to 1 foot should be combined if they are at the same locations. Any deeper sediment samples are not necessary for the human health risk assessment.
§3.2.4	Please address EPA's previous comment on fish sampling that stated that a total of 1 composite filet sample and 1 composite whole body sample is not sufficient to generate a statistically significant data set to be used for fish evaluation. More samples need to be collected to better represent the contaminants in fish at the site. There should be enough samples to calculate mean, maximum, and/or 95 upper confidence limit of the arithmetic mean.
p. 5-3, §5-2	Please include EPA's guidance on Calculating Upper Confidence Limits for Exposure Point Concentrations at Hazardous Waste Sites (OSWER 9285.6-10, December 2002).
p. 5-7, §5-2	The third bullet can be combined with the second bullet with fishing as another activity and eating fish as an exposure pathway for the recreational receptor in addition to having contact with surface soil, sediment, and surface water. It is clearer to consider one recreational visitor receptor with all these recreational activities than to add a fisherman receptor that would do all these activities.
p. 5-9, §5-2	As mentioned earlier, the weight-of-evidence descriptors from EPA's Guidelines for Carcinogenic Risk Assessment (March 2005) should be used to evaluate contaminants in addition to weight-of-evidence

classification from EPA's previous Cancer Guidelines (1986).

EPA recommends use of its hierarchy for human health toxicity values in the risk assessment process. The hierarchy is as follows: Tier 1 - EPA's IRIS; Tier 2 – EPA's Provisional Peer Reviewed Toxicity Values; and Tier 3 - Other toxicity values. This hierarchy is described in EPA's OSWER Directive 9285.7-53 and can be found at: http://www.epa.gov/oerrpage/superfund/programs/risk/toolthh.htm

For chemicals lacking EPA toxicity values, EPA expects to approve any proposed surrogate values from compounds with similar structure before they are used for the risk assessment.

Please explain that a qualitative evaluation will also be described in the risk characterization section of the risk assessment.

p. 5-10, §5-2 Please clarify that only hazard quotients of the same target organs will be added to yield the total hazard index from a contaminant for a receptor for non-cancer risk characterization. Please also revise this section to reflect that EPA's toxicity value hierarchy will be used as mentioned earlier.

Tables 4 Please clarify footnote (1) by stating that EPA Region IX's PRGs were used for carcinogens, but for non-carcinogens, and the PRGs are adjusted to represent a hazard index of 0.1 instead of 1.

Please provide a table for Semivolatile Organic Contaminants of Concern for fish tissue.

Table 5-1 EPA recommends use of the IEUBK model and the Adult Lead Model to evaluate lead exposures. It is not appropriate to screen lead out in the COPC screening process unless it is not detected at the site. This is because there is no risk-based screening standard for lead. Other action levels or screening levels would result in risk higher than 1x10E-6, which is not appropriate to be used for screening COPCs.

Table 5-2 EPA recommends combining the fishermen and the recreational visitor receptor. It is clear that a recreational visitor to the site would have contact with soil, sediment, surface water, and fish through various recreational activities (*e.g.*, wading, fishing, consuming fish, picnicking).

Table 5-3 Please change the EF for resident (adult/child) to 350 days/year and 234 days/year. These values are from EPA's Supplemental Soil Screening Level Guidance (2002). EPA generally uses the national guidance for exposure frequency as a default for residential exposure. Using these values is consistent to the EFs used for resident in Table 5-5.

Please correct the EF for construction worker to 260 d/yr and 104 d/yr for RME and CTE, respectively. Please also correct footnote (1) to reflect the

assumption that construction worker receptor works 1 year instead of 6 months. This is mentioned in Section 5.2 on page 5-8.

Table 5-4 Please correct the EF for fish consuming receptor to 48 d/yr and 24 d/yr to be consistent with the EFs for the recreational visitor. The BW for the child receptor should be changed to 15 kg. The IR for CTE should be changed to 6,400 mg/d and 2,130 mg/d for adult and child, respectively. Please note that 6,400 mg/d is the suggested arithmetic mean value from the Ebert study and 2,130 mg/d reflects 1/3 of this adult ingestion rate. Please correct footnote (4) that 13,000 mg/d represents the 90th percentile ingestion rate instead of the 95th percentile rate. These are the values for all waters, all household consumers sharing catch.

Table 5-4 The body weight for the child receptor was not revised to 15 kg as agreed.

Table 5-5 The ED for resident should be clarified as 24/6 years (RME) and 9/2 years (CTE) for adult and child, respectively. Similarly, BW should be clarified as 70/15 kg.

Table 5-6 Please correct EF for construction worker to 260 d/yr and 104 d/yr for RME and CTE, respectively. Please also correct footnote (1) to reflect the assumption that construction worker receptor works 1 year instead of 6 months. This is mentioned in Section 5.2 on page 5-8.

Please add a footnote for the reference of the SA value for adolescent trespasser.

Table 5-7 The measurement endpoint phrasing was not revised as agreed.

Figure 3-1 The light pole depicted near the paint can removal area is identified as a utility pole in the removal action completion report. This utility pole was relocated during the removal action. The picture of the utility pole in the completion report shows a light on the pole. Is this simply a difference in terminology for the same pole?

p. 5-6 The exposure assessment text was not revised consistently with the revisions made to Table 5-6. In particular, the groundwater EPC will be average concentrations for the CTE and the maximum concentrations for the RME.